

May 2, 2022

VIA UBER PACKAGE DELIVERY

Honorable Joan M. Azrack
United States District Judge
United States District Court
Eastern District of New York
100 Federal Plaza
Central Islip, NY 11722



Re: Ajay Bahl v. New York College of Osteopathic Medicine of New York Institute of Technology, et al., 14-CV-04020 (JMA)(ARL)

Dear Judge Azrack:

I am the Plaintiff in the above referenced action. I apologize for submitting this letter on short notice — I contracted Covid-19 earlier this past week, so I have effectively been on bed rest to due to severe flu symptoms.

I write on behalf of both parties in a joint request to amend the summary judgment briefing schedule as follows:

- Plaintiff's deadline to oppose NYIT's motion for summary judgment is extended from May 3, 2022 to July 8, 2022.
- NYIT's deadline to serve its reply is extended from May 31, 2022 to August 5th, 2022.

The above would amount to nine-week and three-day extension to both party's respective deadlines. Specifically, my deadline to oppose Defendants' motion for summary judgment is currently scheduled for May 3, 2022 and the Defendants' deadline to serve reply papers is currently scheduled for May 31, 2022.

The parties request this extension because my previously retained counsel, Gregory Tsonis, terminated his full scope representation, without advance notice, on the very day that Defendants were scheduled to serve their motion for summary judgment despite numerous communications unequivocally stating he would be making an appearance "this week" for weeks on end. He was requested to make an appearance and move to withdraw under the courts formal procedures to minimize prejudice to myself, however, he refused. Furthermore, after calling me to terminate his representation, he went on to grant defendants their 7th extension requests that same day. Given the "unique" circumstances of the events that took place prior to defendants serving their motion, the parties request this additional time to allow me to obtain new counsel, or failing that, to attempt to write an adequate opposition brief for myself. Furthermore, Defendants have been granted over ten weeks of extension over the course of seven requests from the initial scheduling order for their motion, and this is the first time Plaintiff is writing on behalf of the parties to specifically request extension of the deadline to oppose summary judgment.

Respectfully Submitted,

_____/s/_____
Ajay Bahl
Plaintiff

Ajay Bahl v. New York College of Osteopathic Medicine of NY

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U.S. DISTRICT COURT
E.D.C.A.